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May 26, 2023

Via Electronic Filing

The Honorable Marcia M. Henry, U.S.M.J.
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Zabrodin et al v. Silk 222, Inc. et al*
Case No.: 1:22-cv-07064-KAM-MMH

Dear Honorable Magistrate Judge Henry:

This law firm represents Plaintiffs Damian Zabrodin and Imran Gashimli (together, the “Plaintiffs”) in the above-referenced action.

Pursuant to Your Honor’s Individual Motion Practice Rules II(B), this letter respectfully serves to request an extension of time to file Plaintiffs’ motion for default judgment from June 9, 2023, to, through and including July 9, 2023.

This is the first request of its kind. If granted, this request will not affect any other Court scheduled deadlines.

The basis of this request is that the undersigned will be traveling overseas from June 1, 2023, to, through and including, June 17, 2023, and will have limited availability during this time. The undersigned anticipates being in a position to finalize, and file, Plaintiffs’ motion for default judgment on or before July 9, 2023.

In light of the foregoing, Plaintiffs respectfully requests that Plaintiffs’ deadline to file the motion for default judgment be extended from June 9, 2023, to, through and including July 9, 2023.

We thank the Court for its attention to this matter, and are available at the Court’s convenience to answer any questions related to the foregoing.

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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